



## State of New Jersey

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Patricia Simmons-Pierre  
Remedial Project Manager  
USEPA Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

June 12, 2014

Re: L. E. Carpenter (LE)  
Wharton, Morris County, New Jersey  
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (Department) has completed a review of the 2013 Second Semiannual Monitoring Report dated January 2014, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

An ongoing discharge of free or dissolved product to the Rockaway River and associated wetlands (an Environmentally Sensitive Natural Resource or "ESNR") is unacceptable to the Department. Characterization and delineation of contamination impacting these ESNRs remains incomplete.

Pore water sample SPW-R-3 collected from the banks of the Rockaway River showed DEHP at 50 ppb, more than two (2) orders of magnitude above the FW2 NJ SWQC of 0.003 ppb. Sediment collected from this same location showed DEHP at 400 ppm. The NJDEP sediment Environmental Screening Criterion (Lowest Effects Level or "LEL") for DEHP is 0.182 ppm. For comparison, the Severe Effects Level (SEL) for DEHP is 0.750 ppm.

Detections of BTEX in groundwater monitoring wells and temporary well points adjacent to ESNRs must also be evaluated against FW2 SWQC.

Based upon levels of contaminants detected in sediments and surface water noted above, additional pore water and sediment sampling is necessary to delineate potential impacts to the river and the associated wetlands from the discharge of contaminated groundwater into these surface water ESNRs, possibly followed by pore water/sediment toxicity testing.

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The technical basis for evaluating groundwater and pore water data against FW2 SWQC can be found in Sections 5.4 and 6.2.3 of NJDEP's August 2012 *Ecological Evaluation Technical Guidance*. The entire document may be found at [http://www.nj.gov/dep/srp/guidance/srra/ecological\\_evaluation.pdf](http://www.nj.gov/dep/srp/guidance/srra/ecological_evaluation.pdf).

The Department requires the delineation of dissolved contamination and potential free phase product in the wetlands area. Product left in place may act as a long term source of dissolved ground water contamination, which would continue to discharge into the Rockaway River. Free phase (or residual) product must be destroyed, removed or controlled to prevent this discharge.

Five monitoring wells in the eastern wetlands (MW-31s, -32s, -33s, -34s, and -35s) continue to document high levels of site related contamination; and there appears to be no additional existing downgradient delineation data of these points (please refer to the Department's letter dated June 12, 2014 in response to the Response to Agency Comments on the Additional Wetland Delineation Sampling Results dated February 11, 2014).

Page 5-9, Sec. 5.3. The report states that the ground water contaminant levels are three times higher in TW-35-5 than those in the adjacent monitoring well MW-35 and attributes this to turbidity. It is also noted that the significantly lower contaminant levels in the filtered results at TW-35-6 as evidence of turbidity effects.

Temporary drive point sampling is a focused technique (such as W-35-5) and only samples ground water in the very short interval adjacent to the sampler. A monitoring well averages ground water contamination over the screen length (10 feet for MW-35s) therefore diluting the levels. In this regard, the results for TW-35-5 may be more representative of ground water quality than those at MW-35s. The purpose of TW-35-5 was to profile sample the well, identify the "most contaminated zone(s)" that contributes the contamination and target this zone in subsequent sampling rounds. However, it is unclear if this was completed.

Regarding turbidity, labs test ground water samples for turbidity before analysis. If the test fails, the samples are filtered before analysis. If not, the samples are analyzed without further filtering. Accordingly, the Department regards the samples from 35-5 as representative. The Department would like clarification as to why some TW wells were filtered and others not.

The report cites contaminant levels in another WP as being significantly lower than those in WP-35-5 because filtering was performed as evidence of turbidity biasing sampling results higher. The Department would like clarification regarding whether this could be more of a result of sampling at a different location with differing contaminant levels rather than turbidity effects.

Sampling for Subsequent Rounds. The Department requires that L.E. Carpenter profile the five monitoring wells in the eastern wetlands (and subsequently installed wells) to identify the "most contaminated zone(s)" contributing the contamination and to subsequently target these zones for sampling in future rounds.

L.E. Carpenter proposes to reduce sampling for the site wide program to a semi-annual basis. The Department cannot concur at this time and therefore the current quarterly sampling program should be continued. After further delineation is completed, the results can be reviewed and the sampling program evaluated for frequency.

L.E. Carpenter proposes to remove BTEX from the parameter list for the eastern wetlands wells MW-8, -28s, -28i, -30sR, -30i and 30d because these compounds do not appear at significant levels

and to reduce MNA to annual monitoring. The Department concurs with this proposal.

Contouring. It appears that the contours are drawn without supporting data. For example, figure 5b depicts the 0.7 mg/l contour without data from this portion of the eastern wetlands.

Please incorporate these comments into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager  
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA  
George Blyskun, NJDEP/BGWPA